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*Attorney for Plaintiff*

**IN THE UNITED STATES DISTRICT COURT  
FOR THE NORTHERN MARIANA ISLANDS**

**ART MAN CORPORATION,**

**Plaintiff,**

**vs.**

**IMPERIAL PACIFIC INTERNATIONAL  
(CNMI), LLC,**

**Defendant.**

**Case No. 1:21-cv-00038**

**PLAINTIFF'S NOTICE OF  
MOTION AND MOTION TO  
COMPEL AND ORDER  
SANCTIONS PURSUANT TO FED.  
R. CIV. P. 37(a)(3)(B)(iii), ET SEQ.,  
AND 37(d)(1)(A)(ii)**

**Date:**

**Time:**

**Judge: Hon. Ramona V. Manglonas**

**PLEASE TAKE NOTICE**, that Plaintiff Art Man Corporation, by and through the undersigned counsel, respectfully moves this Court for compel and sanction Imperial Pacific International (CNMI), LLC for its failure to respond to discovery requests. This Motion is made pursuant to Rule 37 and relevant Local Rules. Please refer to the Memorandum of Point and Authorities and Declaration of Colin M. Thompson filed concurrently with this Motion.

Respectfully submitted on October 14, 2022

/s/ Colin. M. Thompson  
**THOMPSON LAW, LLC**  
Colin M. Thompson  
*Attorney for Plaintiff*